

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

RICHARD DASCHBACH	:	
individually and on behalf of all	:	
others similarly situated,	:	
	:	
Plaintiff,	:	
	:	
	:	CASE NO. 1:22-cv-00346-JL
v.	:	
	:	
ROCKET MORTGAGE, LLC,	:	
	:	
Defendant.	:	
	:	December 8, 2023

**JOINT MOTION TO EXTEND CASE SCHEDULE**

Pursuant to Fed. R. Civ. P. 16(b)(4), the parties Plaintiff Richard Daschbach (“Plaintiff”) and Defendant Rocket Mortgage, LLC (“Rocket Mortgage”), by and through their respective counsel, and with good cause therefor, hereby jointly move for a 90-day extension of all deadlines set in this Court’s Order after Preliminary Pretrial Conference (ECF No. 31) (“Scheduling Order”).

In support, the Parties state as follows:

1. The Scheduling Order currently requires the Parties to complete Class Certification Discovery by February 9, 2024 and for Plaintiff to file his motion for class certification by April 23, 2024;

2. Due to a medical condition, Plaintiff has been unable to sit for his deposition, which was noticed by Rocket Mortgage on October 4, 2023 and originally scheduled to occur on November 9, 2023;

3. Although the Parties rescheduled Plaintiff’s deposition for December 6, 2023, Plaintiff’s deposition was postponed again due to Plaintiff’s recovery from the same medical issue, until January 2024 at the earliest;

4. As such, and to avoid any potential prejudice to Rocket Mortgage from being unable to conduct fulsome discovery at this time, the Parties agree that an extension of the current case deadlines is necessary to allow the Parties to complete relevant discovery before class certification briefing and is not for the purpose of delay;

5. This Motion to extend the case schedule will not result in the continuance of any hearing, conference, or trial, as none are currently scheduled in this case.

WHEREFORE, and with good cause shown, the Parties respectfully request that the Court modify its Scheduling Order by extending all current deadlines by ninety (90) days, as follows:

- a. Close of Class Certification Discovery – **May 9, 2024**
- b. Class Certification Motion Deadline – **July 22, 2024**
- c. Close of Discovery – **January 8, 2025**

December 8, 2023

Respectfully Submitted,

/s/ Taylor T. Smith (with permission)

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*Counsel for Rocket Mortgage, LLC*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on December 8, 2023, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ W. Kyle Tayman  
W. Kyle Tayman

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	:	
Defendant.	:	
	:	

**ATTACHMENT TO JOINT MOTION TO EXTEND CASE SCHEDULE**

Scheduling Designation	Current Deadline	Proposed Deadline
Close of Discovery	October 10, 2024	January 8, 2025
Close of Class Certification Discovery	February 9, 2024	May 9, 2024
Expert Challenges	60 days prior to final pretrial conference	60 days prior to final pretrial conference
Claim Certification Motion Deadline	April 23, 2024	July 22, 2024
Summary Judgment Deadline	TBD after class certification	TBD after class certification
Mid-Litigation Discovery Status Conference	TBD	TBD
Joint Status Report	TBD	TBD
Jury Trial	TBD after class certification	TBD after class certification